

**UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OHIO**

Civil Action No. 1:13-cv-02665-JG

PROCOM SUPPLY, LLC, a Colorado limited liability company,

Plaintiff,

v.

MECHEL LANGNER, an individual,
AHARON MANN, and individual,
THE FIRST NATIONAL GROUP, LLC, a limited liability company,
L AND M REALTY BROKERS LLC, a limited liability company,
FIRST NATIONAL MANAGEMENT LLC, a limited liability company,
and REAL INVESTORS LLC, a limited liability company,

Defendants.

**AFFIDAVIT OF WAYNE DALE IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT JUDGMENT**

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, Wayne Dale, being of lawful age and under no constraint or undue influence hereby
make the following statements:

1. I am the owner and sole member of Plaintiff Procom Supply, LLC.
2. Mr. Kasnett and I entered into and completed a series of real estate transactions in the Cleveland area during 2006 and 2007. These projects primarily involved the purchase and sale of houses.

EXHIBIT 8

3. Following the completion of the sale of the houses in late 2007 or early 2008, Daniel Kasnett and his related business affiliates solicited Procom to invest in a multi-tenant condominium building at the Cleveland Clinic in Cleveland, Ohio (the "Cleveland Project").

4. Based upon Mr. Kasnett's representations that the money would be used for the development of real estate, Procom invested \$189,000 in the Cleveland Project (the "Invested Funds").

5. The parties never executed any written contract or other document regarding this intended investment. Procom did not receive any consideration in exchange for what it believed to be its investment in the Cleveland Project. The unwritten agreement between Procom and Mr. Kasnett was that Procom was to invest the Invested Funds in the Cleveland Project as an equity investor, which funds would be repaid with profits when the Cleveland Project was completed.

6. Daniel Kasnett repeatedly represented to me, as Procom's owner, that the Cleveland Project was progressing and even told me that it had been completed when, in fact, the Cleveland Project never actually existed.

FURTHER AFFIANT SAYETH NAUGHT.

(Signature appears on following page)

Dated this 20th day of February, 2014.

PROCOM SUPPLY, LLC

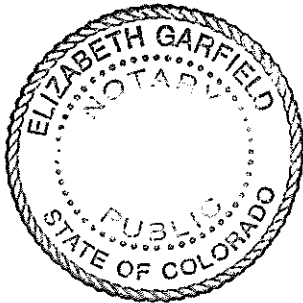
By: 

Wayne Dale, Managing Member

Subscribed and sworn to before me this 20th day of February, 2014, by Wayne Dale as Managing Member of Procom Supply, LLC.

Witness my hand and official seal.

My commission expires: 8/7/14




Notary Public